

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

J.B. INTERNATIONAL, LLC
d/b/a J. BIRNBACH

Plaintiff,

v.

WILLIAM NOBLE RARE JEWELS, L.P.
and WILLIAM NOBLE,

Defendants.

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Civil Action No. 3:22-cv-01422

**JB INTERNATIONAL, LLC D/B/A J. BIRNBACH'S RULE 26(a)(3) PRE-TRIAL
DISCLOSURES¹**

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure, JB International, LLC
d/b/a J. Birnbach's ("JB International") hereby makes the following initial disclosures:

Witnesses

Witness Name	Address	Expected to Call/Call if Needed	Called/Not Called
Jonathan Birnbach	c/o Kaminski Law, PLLC Shanna M. Kaminski P.O. Box. 725220 Berkley, MI 48072 (248) 462-7111	Expected to Call	
William "Bill" Noble	c/o Crawford, Wishnew & Lang, PLLC 1700 Pacific Ave. Suite 2390 Dallas, TX 75201	Expected to Call	
Shanna M. Kaminski	c/o Kaminski Law, PLLC Shanna M. Kaminski P.O. Box. 725220 Berkley, MI 48072	Expected to Call	

¹ Plaintiff's disclosure statement was filed and served a few hours late. To the extent necessary, Plaintiff requests leave to file such disclosures and to have the same deemed timely due to the lack of prejudice to any other party.

	(248) 462-7111		
Jeffrey A. Mitchell	Unknown (will supplement if able)	Call if Needed	
Brandon J. Gibbons	420 Throckmorton St. Suite 1210 Fort Worth, TX 76102	Call if Needed	
Mark W. Stout	420 Throckmorton St. Suite 1210 Fort Worth, TX 76102	Call if Needed	

Plaintiff further cross-designates any and all individuals and/or corporate representatives of any entities designated by the Defendants, regardless of whether such witness designation is made solely for rebuttal or for other purposes. Additionally, Plaintiff reserves the right to supplement or amend as needed within the confines of the Federal Rules of Civil Procedure and reserves the right to call witnesses in rebuttal.

Ex. No.	Date	Description	Bates No./Other Production Information	Offered/Objection Made/Admitted/Admitted via Agreement
Pl. 1	Multiple	Various Memorandums regarding consignment of products as described therein	Attached to various live pleadings, including the Motion for Summary Judgment as DN 37-2 and 37-5	
Pl. 2	Multiple	Various invoices for products as described therein	Attached to various live pleadings, including the Motion for Summary Judgment as DN 37-3 and 37-6	
Pl. 3	In or about August 2019	Letter Agreement Regarding Amounts Owed	Attached to various live pleadings, including the Motion for Summary Judgment as DN 37-4	
Pl. 4	Around March 3, 2020	Email Between Parties	Attached to various live pleadings, including the Motion for Summary Judgment at DN 37-7	

Pl. 5	January 30, 2023	Defendants' Disclosures	Produced by Defendants	
Pl. 6	July 13, 2023	Balance Calculation	Produced to Defendants	
Pl. 7	Various	Attorney's Fees Invoices	Will be supplemented prior to trial	
Pl. 8	Various (Dates as indicated on documents)	Various Reports demonstrating amounts paid, memorandums owed, and invoices owed	Produced to Defendants.	

Plaintiff reserves the right to introduce any exhibits designated by the Defendants and any exhibits necessary for rebuttal. Further, to the fullest extent allowed, Plaintiff reserves the right to supplement, amend, or edit this Pre-trial disclosure as such may become necessary and will do so as promptly as possible. Additionally, Plaintiff reserves the right to offer any exhibits produced by any party to this litigation or attached to any pleading or discovery product in this case.

Dated: December 9, 2023

Respectfully Submitted,

PADFIELD & STOUT, L.L.P.

420 Throckmorton Street, Suite 1210
Fort Worth, Texas 76102
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/s/ Brandon J. Gibbons

Mark W. Stout

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Local Counsel for Plaintiff

KAMINSKI LAW, PLLC

/s/ Shanna M. Kaminski

By: Shanna M. Kaminski

MI Bar No. P74013

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Berkley, MI 48072

(248) 462-7111

skaminski@kaminskilawpllc.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing has been forwarded to the counsel of record via e-service on December 9, 2023.

/s/ Brandon J. Gibbons
Brandon J. Gibbons